

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOC”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

MOTION FOR *PRO HAC VICE* ADMISSION OF GABRIELLE E. TENZER

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby move the Court for the admission of

Gabrielle E. Tenzer, Esq., to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Ms. Tenzer is an attorney with Kaplan and Company, LLP, 350 Fifth Avenue, Suite 7110, New York, NY 10118, Tel: (212) 763-0883, Email: gtenzer@kaplanandcompany.com.

2. Ms. Tenzer is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Bar ID No. 4545034 – since November 14, 2007).

3. Ms. Tenzer agrees to submit to and comply with the appropriate rules of procedure as required in the case for which she is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Gabrielle E. Tenzer, Esq., to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: March 12, 2018

Respectfully submitted,

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2018, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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Pro Se Defendant

I further hereby certify that on March 12, 2018, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan
a/k/a Loyal White Knights Church of
the Invisible Empire, Inc.
c/o Chris and Amanda Barker
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Richard Spencer
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Moonbase Holdings, LLC
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East Coast Knights of the Ku Klux Klan
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Fraternal Order of the Alt-Knights
c/o Kyle Chapman
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Augustus Sol Invictus
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s/ Robert T. Cahill

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